

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT**

MARK W. DOBRONSKI,)	
)	
Plaintiff,)	
)	Case No. 2:24-cv-12807
v.)	
)	Hon. Judge Gershwin A. Drain
IDEAL CONCEPTS, INC., DAVID)	Hon. Magistrate Kimberly G. Altman
BENJAMIN GARCIA, and)	
MICHAEL JOSE ZUNIGA,)	
)	
Defendants.		

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendants Ideal Concepts, Inc., David Benjamin Garcia, and Michael Jose Zuniga (“Defendants”) by and through undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b), hereby move unopposed for an extension of time through December 15, 2024 to respond to Plaintiff’s Complaint, and in support thereof state as follows:

1. On October 24, 2024, Plaintiff Mark W. Dobronski (“Plaintiff”) initiated this civil action against Defendants. Defendants Ideal Concepts, Inc. and Michael Jose Zuniga were served on October 25, 2024. Defendant David Benjamin Garcia was served on October 26, 2024.

2. Pursuant to Federal Rule of Civil Procedure 12(a), Defendants Ideal Concepts, Inc. and Michael Jose Zuniga’s deadline to file their responsive pleading

is November 15, 2024. *See* Fed. R. Civ. P. 12(a)(1)(A). Defendant David Benjamin Garcia's deadline to file his responsive pleading is November 18, 2024. *See id.*

3. Defendants are investigating the allegations in the Complaint, which investigation is critical to determining how Defendants will respond to the complex and extensive 31 page Complaint. Further, the outcome of Defendants' investigation will enable counsel for Defendants to have a more productive preliminary discussion regarding this case with Plaintiff.

4. Counsel for Defendants contacted Plaintiff to determine whether Plaintiff opposed Defendants' requested extension. Plaintiff confirmed that he does not oppose or contest Defendants' request.

5. Defendants thus respectfully request that this Court extend the deadline for Defendants' responsive pleading to December 15, 2024.

6. This is Defendants' first request for an extension and this Motion is not being made for purposes of delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Court enter an order (i) permitting Defendants until December 15, 2024 to file a responsive pleading to Plaintiff's Complaint; and (ii) awarding all other relief deemed equitable and just.

Dated: November 12, 2024

Respectfully submitted,

/s/ Jamie N. Ward

Jamie N. Ward

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Jamie N. Ward